

## FEDERAL FACILITIES FORUM TELECONFERENCE

Thursday, August 10, 2000

### NEXT FEDERAL FACILITIES FORUM TELECONFERENCE

The next Federal Facilities Forum teleconference is scheduled for September 14, 2000, from 1:30 to 3:00 p.m. EST. The call-in number is 202-260-7280, access code 2552#. Region 2 will serve as technical lead.

### INSTITUTIONAL CONTROLS

Allison Abernathy (FFRRO) summarized the institutional controls (ICs) research that she is involved in. The first is a trends analysis of the 1999 Records of Decision (RODs). Headquarters is trying to determine how well institutional controls (ICs) are documented in the RODs and whether or not documentation has improved since the Region 4 and Region 10 guidances were published. Headquarters is also examining all of the federal facility RODs using ICs from 1992 to the present. In addition, Headquarters is scoping new national guidance for ICs at active bases. This guidance will supercede the Region 4 and Region 10 guidances. It will not include BRAC or FUDS sites, but will apply to all federal agencies.

Glenn Kistner (Region 9) asked if national guidance exists or is being planned for ICs at closed military bases. Abernathy indicated that the only guidance that exists is for ICs for property transfers at closed bases. She indicated that some regions are taking the IC guidance for property transfers and backing out the requirements into the RODs.

Kistner also asked for further guidance on how much information on ICs is enough at the feasibility study, the proposed plan, and ROD stages of cleanup. Due to time constraints, the Forum agreed to table further discussion of ICs until the next conference call on September 14.

Abernathy indicated that she has been involved in several conference calls to scope new national guidance. She noted that only regional esquires have participated—no RPMs. She stressed the importance that RPMs participate on future calls and agreed to keep the Federal Facilities Forum informed of future conference calls and planning activities.

### STAKEHOLDER ISSUES

As part of the Headquarter's scoping efforts, Abernathy was involved in the East Coast Stakeholders Forum in June and the West Coast Stakeholders Forum in August. She discussed some of the feedback that she received from the stakeholders and asked the Forum members whether they are hearing the same types of comments. She also asked what more EPA should be doing in terms of stakeholder involvement in ICs.

Some of the comments Abernathy has heard from stakeholders include:

- EPA is not involved enough in institutional control issues at stakeholder meetings.
- EPA is not assertive enough at stakeholder meetings. (The public feels that EPA should be keeping an eye on the other agencies involved.)
- They believe (incorrectly) that 5-year reviews are the only means for monitoring ICs.
- They are left out of decisions since they are involved too late and can't influence the process.
- Details on implementation of ICs may be occurring post-ROD.
- ICs are used to avoid doing adequate site characterization or active remediation.

Due to time constraints which prevented further discussion, Abernathy agreed to summarize the comments and distribute them to the Forum for their review. The Forum agreed to table their discussion of the comments until the September 14 conference call. Abernathy will consider continuing discussion at the fall meeting of the TSP in Charleston.

### REGION 1 TECHNICAL ISSUES

Matt Barry (Region 1 RPM) asked the Forum if they know of sites where water-to-water diffusion samplers have been used for long-term monitoring of interior VOC plumes, rather than low-flow sampling. He noted that the USGS is working with Region 1 technical personnel on such projects. The samplers are made with zip-lock plastic bags on a string and weighted with bolts to lower them into monitoring wells.

Chris Villareal (Region 6) indicated that diffusion samplers are being used for long-term monitoring at the Superfund site in Region 6. Glenn Kistner also indicated that Region 9 has tested diffusion samplers at McClellan AFB and will probably use them to monitor the plume in the future. He noted that the samplers should be used where there is a sufficient hydraulic gradient to prevent water from stagnating in the wells. Another participant agreed that low gradients may be a problem for diffusion samplers. Volatile contaminants—especially those with higher Henry's Law constants—could be lost to the well headspace; thus, the contaminants in the sampler may not be representative of the contaminants in the aquifer.

Kistner pointed out that there is some uncertainty as to where to place the samplers within longer well screens. Barry indicated that Region 1 has been placing three samplers at different intervals along 10-foot well screens. The analytical results at each depth vary, but this may be more representative of conditions in stratified wells than the results of low-flow sampling. Randall Ross (SPRD-Ada) suggested the use of DMLS, another type of passive multi-layer ground-water sampler, to obtain a good vertical profile of contaminants. These samplers are being used at Edwards AFB to sample chromium and TCE.

Kistner indicated that diffusion samplers are cheaper than low-flow samplers because they reduce the required labor hours and disposal costs are lower because purging is not required. Currently, it is suggested that the samplers be left in the well for at least 2 weeks before analyzing them.

#### UPDATE ON FALL 2000 TSP MEETING

The room block at the Westin Francis Marion Hotel is full, so Forum members should make their reservations on the room block at the Hampton Inn. The tentative agenda for meeting is:

Monday afternoon (October 22): business session

Tuesday or Wednesday: half-day visit to a Navy site and a half-day of presentations by SOUTHDIV personnel

Tuesday or Wednesday: Forum technical sessions

Thursday and Friday (October 27): NGWA geochemistry training course

Most Forum members will only attend the training course through Friday morning in order to travel home on Friday evening. If Forum members decide to stay in Charleston until Saturday, their lodging for Friday night *will not* be covered under the TIO purchase order.

The Forum co-chairs need to know preferred topics for SOUTHDIV presentations and suggestions for Forum technical presentations. The Navy has submitted a list of topics to choose from. All Forum members should send comments and suggestions for topics to Meghan Cassidy by August 18. Otherwise, the co-chairs will select the topics in consultation with the Navy. Cassidy emphasized the importance of finalizing the agenda as soon as possible so that it can be provided to states representatives that are invited to participate.

The Forum discussed the possibility of inviting a member of Fort Ord's Strategic Management, Analysis, Requirements, and Technical (SMART) Team to the Charleston meeting to give a presentation. Since the TSP is not able to fund speakers' travel to the meeting, it was suggested that Dick Wright of the Region 4 office in Atlanta be invited since travel costs would be low. A SMART 2 Team is starting up at the Savannah Army Depot; the Forum may consider inviting a member from this team as well. Kistner agreed to talk to a SMART Team member in Region 9, and another participant offered to speak with David Seely, Project Manager of Savannah Army Depot.

Other suggested topics for the fall TSP meeting were:

- sediment issues
- underwater UXO detection work
- update on perchlorate issues

Chris Villarreal offered to update the Forum on the latest perchlorate toxicological studies and arrange for a vendor presentation on anaerobic biodegradation of perchlorate.

#### OPEN MIKE/REGIONAL ISSUES

Harry Craig mentioned that there will be a meeting on August 29-30 at NHEERL-Las Vegas between the laboratory, RPMs, and the U.S. Army Corps of Engineers. The laboratory will be evaluating the Corps' statistical methods for UXO.

#### ATTENDEES

Michael Barry, Region 1  
Megan Cassidy, Region 1  
Steve Hirsh, Region 3  
Chris Villarreal, Region 6  
Jim Kiefer, Region 8  
Glenn Kistner, Region 9  
Harry Craig, Region 10  
Randy Carlson, Kansas Department of Health and Environment  
Leo Henning, Kansas Department of Health and Environment  
Robert Weld, Virginia Department of Environmental Quality  
Allison Abernathy, FFRRO  
Juan Parra, FFRRO  
Ron Ludwig, SPRD-Ada  
Randall Ross, SPRD-Ada  
Diane Dopkin, EMS, Inc.